

Kessler, Ellen

From: Randall.Doneen@dnr.state.mn.us
Sent: Thursday, July 23, 2009 7:18 AM
To: Strength, Stephanie - Washington, DC
Cc: Lisa.Joyal@dnr.state.mn.us; Melissa.Doperalski@dnr.state.mn.us
Subject: CAPX Hampton Rochester LaCrosse 345 kV EIS Scoping Comments
Attachments: strength072309.pdf

Ms. Strength:

Please accept the attached Minnesota Department of Natural Resources EIS Scoping comments in determining the final scope of the CAPX2020 Hampton-Rochester-La Crosse 345 kV Transmission Line. A hard copy of the letter is in the mail.

Please contact me if you have any questions.

Randall Doneen
(651) 259-5156
Environmental Review Unit
Division of Ecological Resources
MN Department of Natural Resources

Minnesota Department of Natural Resources
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July 23, 2009

Stephanie A. Strength
USDA Rural Development
1400 Independence Ave. SW, MAIL STOP 1571
Washington, DC 20250-1571

RE: EIS Scoping Comments for CAPX2020 Hampton-Rochester-La Crosse 345-kV
Transmission Line Project

Ms. Strength:

The Minnesota Department of Natural Resources (DNR) is providing the following scoping comments for preparation of the CAPX 2020 Hampton-Rochester-La Crosse 345-kV Transmission Line Project Environmental Impact Statement (EIS).

S-005-001 The EIS should include a comparative environmental analysis of the various corridor alternatives to determine which corridor would minimize negative environmental effects from the project. The DNR has several sources of information that should be included as part of the comparative analysis. The Natural Heritage Information System (NHIS) provides information on Minnesota's rare natural resources such as native plant communities and state-listed plants and animals. Three of the NHIS databases (MCBS Native Plant Communities, MCBS Sites of Biodiversity Significance, and MCBS Railroad Rights-of-Way Prairies) are available as GIS shapefiles and can be downloaded from the DNR Data Deli at <http://deli.dnr.state.mn.us>. The Macro-Corridor Study states that the MCBS Sites of Biodiversity Significance data used in the study was downloaded in 2006. Given that this data is continually being updated and improved upon, the DNR recommends that the current version of the MCBS Sites of Biodiversity Significance and MCBS Native Plant Communities be downloaded and used for future analyses. The locations of state-listed species and other rare features are maintained in the Rare Features Database. The Rare Features Data can be obtained through a license agreement or by submitting a data request form (please see http://files.dnr.state.mn.us/eco/nhnrp/natural_heritage_data.pdf). In addition, the DNR has developed a Rare Species Guide, which is the state's current authoritative reference for listed plants and animals. The Rare Species Guide can be accessed on the DNR web page at <http://www.dnr.state.mn.us/rsg/index.html>. The DNR has also prepared a comprehensive wildlife conservation strategy (*Tomorrow's Habitat for the Wild and Rare, An Action Plan for Minnesota Wildlife*, January 2006) that identified key habitats for Species of Greatest Conservation Need within each Ecological Classification System (ECS) subsection. This document can also be found on the DNR web page <http://www.dnr.state.mn.us/cwcs/index.html>. The information derived from the abovementioned resources should be included in the comparative analysis and within impact assessment and mitigation measures for the various alternatives carried forward in the EIS. Please note that these informational resources are intended to be a guide in what sensitive resources are recorded or known to exist in identified areas and do not necessarily indicate that other sensitive species are not found in those areas. Due to time and resources, species records in some areas may not be well documented.

S-005-003 It should be noted that rare species surveys will be required if any native prairie remnants, or other potential habitat of state-listed threatened or endangered species, will be impacted by the proposed

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S-005-001

Your comment has been noted. The criteria used to route the transmission line is described in the Macro Corridor Study which is available on the RUS website at: <http://www.usda.gov/rus/water/ees/eis.htm>. These criteria and routing process will be addressed in the Draft Environmental Impact Statement. The project is still in the development and planning stages and the utilities have not yet permitted a route for the transmission line.

The Draft Environmental Impact Statement will be available on the RUS website at: <http://www.usda.gov/rus/water/ees/eis.htm>. Comments on the Draft Environmental Impact Statement will be solicited after its publication.

S-005-002

Your letter/comment card has been noted. The criteria used to route the transmission line is described in the Macro Corridor Study which is available at: <http://www.usda.gov/rus/water/ees/eis.htm>. These criteria and routing process will be addressed in the Draft Environmental Impact Statement. The project is still in the development and planning stages and the utilities have not yet permitted a route for the transmission line.

Potential impacts to wildlife (including rare species), vegetation, and wetlands will be addressed in the Draft Environmental Impact Statement.

S-005-003

Your comment has been noted. Please refer to comment response S-005-002.

S-005-003 project. In addition, habitat surveys may be required if more information is needed to assess areas with limited data.

Corridor Alternatives

S-005-004 There are two alternatives identified for crossing the Cannon River. Portions of the Cannon River in this area are designated as a State Recreation River per Minnesota Rules 6105.1600. State wild, scenic and recreational rivers are defined as rivers, along with their adjacent lands, that possess outstanding scenic, scientific, historical, and recreational resources (MN Statutes 86A.05, Subd.10). The proposed crossing approximately one mile west of the Highway 56 crossing is a relatively undisturbed corridor with intact floodplain forest on the immediate shorelines. A green field crossing of the Cannon River in this area would have substantial negative effects to the natural characteristics which underlie the Wild and Scenic River designation. In addition, Dakota County's Master Plan for Lake Byllesby Regional Park references the area as having high potential for intact pre-contact archaeological resources due the relatively undisturbed nature of the area (*Lake Byllesby Regional Park Master Plan*, July 2005). Alternatives to crossing this river should be limited to existing disturbed corridors such as highways or existing transmission lines.

S-005-008 The proposed corridor alternative crossing the Mississippi River at Alma would significantly adversely affect the McCarthy Lake Wildlife Management Area (WMA). This area has many important natural resources that would be impacted by the proposed project. McCarthy Lake WMA has one of the largest concentrations of the Blanding's turtle, a state-listed threatened species, in the United States and is also considered a significant habitat area for six other species of native turtles. The WMA also receives substantial numbers of waterfowl during spring and fall migrations and provides nesting habitat for sandhill cranes, one of the few in the state for Greater sandhills, and many migratory waterbirds. In addition, there are recorded breeding Henslow's sparrows, state-listed as endangered, and other rare grassland bird species on the WMA, which require open grassland habitats. Studies have shown that towers/poles may cause the displacement of grassland songbirds. Native plants that occur in the WMA are also likely to be negatively impacted by the proposed project. Power line corridors are typically chemically treated to keep brush and trees down, this would put many native plants at risk. Although there is a sub-alternative to avoid the WMA, the proposed bypass would follow the west property line on the WMA for over a mile, would pass close to a residence and would cross a wetland mitigation bank currently being constructed. The DNR cannot support this sub-alternative.

S-005-005 One of the proposed alignments is adjacent to the Woodbury WMA in Goodhue County near Zumbrota. There is a 69kV line less than a mile to the north. The DNR would recommend that the new line follow the existing alignment to the north if the Alma alternative is chosen.

S-005-009 Another proposed segment follows the west side of the Haverhill WMA in Olmsted County. This segment is particularly problematic as this unit provides winter food plots for geese which roost on Silver Lake and the Zumbro River within Rochester. The new line would pose a barrier to birds making feeding flights between Silver Lake and the Haverhill WMA. There is an existing 69kV line to the west of this proposed alignment, but the proposed line would be significantly taller and therefore would pose more of a threat to birds that utilize this area. The DNR has invested considerable resources in trying to establish the Haverhill WMA as the winter food supply for geese wintering in the Rochester area.

S-005-006 Based on the revised corridors presented in the USDA Rural Development *Macro-Corridor Study*, May 2009, it appears that the corridor alternatives have avoided impacts to the Whitewater State Park and Carley State Park. If proposed corridors included or may include portions of these or other State Parks,

S-005-004

Your comment has been noted. The criteria used to route the transmission line is described in the Macro Corridor Study which is available on the RUS website at:
<http://www.usda.gov/rus/water/ees/eis.htm>. These criteria and routing process will be addressed in the Draft Environmental Impact Statement. The project is still in the development and planning stages and the utilities have not yet permitted a route for the transmission line.

S-005-005

Your comment has been noted. The criteria used to route the transmission line is described in the Macro Corridor Study which is available on the RUS website at:
<http://www.usda.gov/rus/water/ees/eis.htm>. These criteria and routing process will be addressed in the Draft Environmental Impact Statement. The project is still in the development and planning stages and the utilities have not yet permitted a route for the transmission line.

S-005-006

Your comment has been noted. Potential impacts to the aesthetic quality of the areas surrounding the transmission line will be addressed in the Draft Environmental Impact Statement.

S-005-006 the DNR would not permit construction of the transmission lines within a State Park Statutory Boundary. In addition, if a corridor is proposed near a State Park the EIS should include a viewshed analysis and the effects the transmission line would have to park visitors.

S-005-010 Within the I-90 Corridor, the area that extends south of Interstate 90 is rich in bluffland habitat and is one of the prime areas that the DNR has been working with private landowners to manage and enhance their lands for the timber rattlesnake, a state-listed threatened species. DNR has invested thousands of dollars on habitat restoration, which could be jeopardized by the construction of the transmission line. Routing through this area will be problematic as most bluffs are likely to have rattlesnakes, which are protected under Minnesota's endangered species law (*Minnesota Statutes*, section 84.0895) and associated rules (*Minnesota Rules*, part 6212.1800 to 6212.2300 and 6134). Transmission projects may help by opening up bluffs by clearing out cedars, but the overall presence and negative impact on natural resources and recreational land use would outweigh that potential benefit. Additionally, this area is still relatively undeveloped; the transmission line would significantly increase fragmentation and result in negative edge effects.

Of the proposed corridor alternatives presented in the provided reports, the DNR prefers the use of the existing disturbed corridors of Highway 52 and 190.

Cumulative Impacts

S-005-007 The DNR has concerns regarding the future cumulative impacts as a result of the proposed project. The DNR is aware that a key factor in siting wind farm facilities is access to adequate transmission lines with high carrying capacities. Due to the nature of the proposed project, the DNR would anticipate an increase in proposed wind farm projects correlated to the chosen corridor corridor. The EIS should include a discussion on this and other potential cumulative impacts anticipated or areas that may be further impacted for each alternative carried forth in the EIS.

Thank you for consideration of DNR comments. If you have any questions regarding these comments or other concerns, please contact me at (651)259-5156.

Sincerely,



Randall Doneen
Environmental Review Planning Director

S-005-007

Your comment has been noted. Cumulative Impacts will be addressed in the Draft Environmental Impact Statement.

S-005-008

Your comment has been noted. The criteria used to route the transmission line is described in the Macro Corridor Study which is available on the RUS website at: <http://www.usda.gov/rus/water/ees/eis.htm>. These criteria and routing process will be addressed in the Draft Environmental Impact Statement. The project is still in the development and planning stages and the utilities have not yet permitted a route for the transmission line.

S-005-009

Your comment has been noted. The criteria used to route the transmission line is described in the Macro Corridor Study which is available on the RUS website at: <http://www.usda.gov/rus/water/ees/eis.htm>. These criteria and routing process will be addressed in the Draft Environmental Impact Statement. The project is still in the development and planning stages and the utilities have not yet permitted a route for the transmission line.

S-005-010

Your comment has been noted. The criteria used to route the transmission line is described in the Macro Corridor Study which is available on the RUS website at: <http://www.usda.gov/rus/water/ees/eis.htm>. These criteria and routing process will be addressed in the Draft Environmental Impact Statement. The project is still in the development and planning stages and the utilities have not yet permitted a route for the transmission line.